



275 Madison Avenue | 26th Floor

New York, New York 10016

T 212.297.0700 | F 212.297.0730

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, NY 10007

October 11, 2019

Re: Laurence T. Glickman, M.D. v. First Unum Life Insurance Company, 1:19-cv-05908 (VSB)

Dear Judge Broderick:

The parties submit this joint letter to propose a briefing schedule regarding the scope of discovery pursuant to Your Honor's October 3, 2019 order on the record during the initial conference.

Brief	Date	Page Length
Plaintiff's Initial	November 8, 2019	10
Defendant's Opposition	November 22, 2019	10
Plaintiff's Reply	December 6, 2019	5

/s/Matthew Maddox

Matthew Maddox
Counsel for Dr. Laurence T. Glickman
RIEMER & ASSOCIATES, LLC

275 Madison Avenue, 26th Floor
New York, New York 10016
P: 212-297-0700, Ext. 102
F: 212-297-0730
mmaddox@riemerlawfirm.com

/s/Louis P. Di Giaimo

Louis P. Di Giaimo
Counsel for First Unum Life Insurance Company
MCELROY, DEUTSCH, MULVANEY &
CARPENTER, LLP

One Hovchild Plaza, 4000 Route 66
Tinton Falls, New Jersey 07753
P: 973-425-8843
F: 732-922-2702
ldigiaimo@mdmc-law.com